



No. SW-14-926

In the District Court)
Oklahoma County)
State of Oklahoma)

AFFIDAVIT FOR SEARCH WARRANT
FILED IN DISTRICT COURT
OKLAHOMA COUNTY

AUG 21 2014

TIM RHODES
COURT CLERK

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BEFORE THE UNDERSIGNED JUDGE OF THE DISTRICT COURT

I, Gary B. Eastridge, **being duly sworn deposes and says that at the following location:** (1) black Iphone cell phone bearing IMEI identifying number 990002702037274 in custody of Oklahoma County District Attorney's office in the City of Oklahoma City, Oklahoma County, State of Oklahoma, there is now located certain property, to-wit: Evidence of public corruption and violations of state statutes including Use of a Computer to Violate State Statue, 21 O.S. §1958, Contributions by Intermediary, 21 O.S. §187.1, and Contributions by Corporations, 21 O.S. §187.2 and violations of similar federal statutes.

Specifically, information or communications showing coordination and/or collusion between or among CHAD ALEXANDER, any "527 super pac", 401(c) or similarly-designed political action committees, and Fount Holland, AH Strategies, or other coordination or collusion between "527" super pacs, 401(c) or similarly-designed political action committees and the campaigns of individual political candidates. This evidence may be electronically stored information including but not limited to phone directory, notebook pad, text messaging, stored messages, stored images, recording of incoming calls and outgoing calls, stored or saved in (1) black Iphone cell phone with assigned number (405) 822-1092 and (1) black Iphone cell phone with assigned number (405) 816-3813 and assigned IMEI numbers 990002702037274 and 990002793061779

Your affiant is Chief investigator for the Oklahoma County District Attorney's office where he has been employed since January 2, 2007. Your affiant retired October 20, 2000 as an Inspector with the Oklahoma City Police Department (OCPD) where he had been employed as a police officer since February of 1979. Your affiant has completed over 1,700 hours of training recognized by the Oklahoma Council on Law Enforcement Education and Training and has experience investigating crimes against persons and property.

On May 13th, 2014 Oklahoma City Police Department Narcotics Inspector Tobias Frederick and Federal Bureau of Investigation Special Agent M. Schweers were conducting an investigation into the illegal drug trafficking activities of several individuals operating in the Oklahoma City metro area. To date Frederick has confirmed this activity among these individuals and has recovered approximately (5) five ounces of cocaine hcl. Frederick was conducting surveillance on Sammy Dehart, a known drug trafficker in this case, and observed him meet with Chad D. Alexander (ALEXANDER) at the Deep Fork Grill Restaurant located at 5418 N. Western Oklahoma City, Oklahoma. Frederick observed what he believed to be an illegal drug transaction, based upon Dehart' s method of operation that has been documented by Frederick. ALEXANDER was later stopped by an Oklahoma City Police Officer which yielded cocaine and prescription medication in his possession. Frederick and Special Agent M. Schweers later interviewed ALEXANDER. ALEXANDER was advised of his rights under Miranda and he agreed to talk with the offices whereupon ALEXANDER admitted that he purchased cocaine at the Deep Fork Grill from Dehart. ALEXANDER also admitted that he obtained the prescription controlled substance from another individual and that he did not have a valid prescription for it. Dehart has since been charged in connection with this event with unlawful distribution of a controlled dangerous substance in Oklahoma County in CF-2014-4390. ALEXANDER stated that he would do anything to assist law enforcement in this current drug trafficking investigation and any other on-going criminal investigations in exchange for consideration on his current charge of CDS possession.

On the date of ALEXANDER' S arrest Frederick observed ALEXANDER to be in possession of two iPhone cell phones. ALEXANDER stated that he owned both and provided the above listed cell phone numbers as the numbers assigned to these devices. ALEXANDER stated that he contacted Dehart, the drug trafficker he was observed meeting with just prior to his arrest, by text message and requested that Dehart meet ALEXANDER at the Deep Fork Grill. ALEXANDER stated that he had Dehart listed in his phone book address on his cell phone. Frederick was under the belief that ALEXANDER had intentions

of cooperating fully in this investigation and therefore he allowed ALEXANDER to keep his cell phones which by his own admission contained evidence of the drug crimes. Frederick later learned that ALEXANDER made a public statement that he was leaving for Texas for a period of time. Frederick, believing that ALEXANDER had changed his mind about cooperating with law enforcement, prepared an affidavit and search warrant for both phones in order to preserve the evidence he knew was located on them.

One to two days after ALEXANDER' S arrest in May, Frederick served the warrant and seized both phones from ALEXANDER and had the information contained within them downloaded for forensic review. While looking for evidence relating to his drug trafficking investigation Frederick observed several text messages and other information relating to ALEXANDER' S interaction with various political candidates and organizations listed at the outset of this affidavit.

Inspector Frederick shared this information with your affiant and it was relevant to me because during the past sixty-days, the Oklahoma County District Attorney' s Office has been contacted by multiple persons regarding the alleged criminal violations by CHAD ALEXANDER enumerated at the outset of this affidavit. These persons are all involved in political, campaign, lobbying, and/or fundraising activities, but do not wish to be named for fear of political and/or financial reprisal by ALEXANDER and those connected to him. All are gainfully employed, upstanding citizens with no criminal record. These persons all state that ALEXANDER operates the " Oklahomans For a Conservative Future" Super-Pac, and at the same time he is or was actively involved with the campaigns of individual candidates being represented by Fount Holland and A-H Strategies, an Oklahoma City political consulting firm operated by HOLLAND and others. Some of these persons have alleged that they were approached by Xavier Neira, a co-incorporator of Oklahomans For a Conservative Future with ALEXANDER, and A-H personnel who demanded they donate both to the Super-Pac and to the candidates being promoted by A-H Strategies. This type of coordination and collusion between Oklahomans For a Conservative Future and individual candidates would be a violation of federal election laws and rules, and could

violate state laws if corporate money or intermediaries are used to funnel the contributions.

Among those contacting the District Attorney's Office was a representative from the Janet Baressi campaign for State Superintendent of Public Instruction. This person provided an e-mail obtained via an Open Records Act request, dated April 22, 2013 and sent by Joy Hoffmeister, who recently beat Baressi in the primary election, to Jenks Public Schools Superintendent Kirby Lehman. This e-mail reads as follows:

Just wanted to update you. I am meeting this morning in OKC with Fount Holland (AH Strategies) at 11 am, and Chad Alexander (probably better fit for the independent campaign) at 1 pm.

Wednesday evening I am meeting for dinner with Todd Thomsen, Dennis Casey, Lee Denney, Ann Coody, and Dustin Roberts. Katie Henke couldn't make it. All know reason for the dinner.

Will let you know how it goes.

A text message string obtained from one of ALEXANDER'S i-phones pursuant to the search warrant mentioned above, dated April 24th, 2013, between him and Fount Holland, reads as follows:

Fount Holland: " Will boren get pissed if you do an IE against Baressi

Chad Alexander: " I will use a different 527."

Fount Holland: " Money in it"

Fount Holland: " I hear the oea and the Kaisers might put mega m"

Fount Holland: k

Chad Alexander: " I know the oea will"

Fount Holland: " Kaiser might play both sides"

I have learned through my investigation that a " 527" refers to the Super-Pacs such as Oklahomans for a Conservative Future, and refers specifically to one of the sections of the federal tax laws permitting them. I also know that " ie" means independent expenditure, meaning expenditure of money by one of these 527 organizations which are forbidden by law to coordinate with specific candidate campaigns and are thus exempt from many of the requirements of other political action committees.

I respectfully submit that the e-mail and text string shown above indicate that as she was preparing to run for State Superintendent in 2013, Joy Hoffmeister was coordinating with both Fount Holland/AH Strategies, and Chad ALEXANDER, and that her reference to ALEXANDER being a " better fit for the independent campaign" means using him and his 527 super-pac to make an " independent expenditure" of money against Janet Baressi while also using AH-Strategies to coordinate her direct campaign for the office. The communication between HOLLAND and ALEXANDER only two days later regarding whether " boren" (presumably Oklahoma University President David Boren) will be unhappy about ALEXANDER spending money to oppose Baressi is direct evidence of coordination between the two involving Hoffmeister' s campaign for State Superintendent and one or more of the 527 organizations controlled by ALEXANDER working against Baressi' s campaign for the office. The reference to ALEXANDER using " a different 527" appears to be his method of keeping Boren from learning of ALEXANDER' S opposition to Baressi, and this is particularly relevant given ALEXANDER' s work as a lobbyist for the University of Oklahoma and his direct ties and communications with President Boren in that capacity.

While executing the drug investigation search warrant on ALEXANDER' S laptop computer, Oklahoma City Police Department Computer Forensics Investigator Rob Holland turned up numerous communications and/or other digital files relating to the same names and subject matter which your affiant currently has under investigation. After he advised the District Attorney' s Office that he was seeing such evidence on ALEXANDER' S laptop, Rob Holland was instructed to cease the search while a warrant was obtained

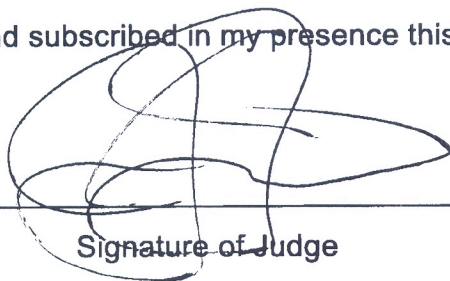
authorizing a broadened search for not only evidence of the drug crimes, but also evidence showing that ALEXANDER in his role as controller of one or more " 527 Super Pacs" , is also actively and illegally involved in the campaigns of individual candidates which he seeks to assist by expenditures through these " 527" organizations. This second warrant for the laptop computer authorizing a broader search has now been issued and that forensic search is ongoing.

Based on the above information showing that these I-Phones contain information similar to that which prompted the broadened search of the laptop computer, your affiant believes that there is probable cause that ALEXANDER' S phones: (1) black Iphone cell phone with assigned number (405) 822-1092 and (1) black Iphone cell phone with assigned number (405) 816-3813, has evidence of the above referenced state and/or federal law violations, and I respectfully request that a warrant issue authorizing the search of these two devices for that evidence



SIGNATURE OF AFFIANT

Sworn to before me and subscribed in my presence this 16th day of July, 2014



Signature of Judge